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*Attorneys for Defendant
American Security Insurance Company*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MAHASE RAMNAUTH, *et al.*,
on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

FREEDOM MORTGAGE
CORPORATION, *et al.*,

Defendants.

Case No. 3:18-CV-16477-BRM-DEA

**MOTION TO DISMISS THE CLASS
ACTION COMPLAINT BY
DEFENDANT AMERICAN
SECURITY INSURANCE
COMPANY**

Motion Date: March 4, 2019

PLEASE TAKE NOTICE THAT, pursuant to Fed. R. Civ. P. 12(b)(6), defendant American Security Insurance Company, through its counsel of record, shall move the United States District Court for the District of New Jersey, before the Honorable Brian R. Martinotti, at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, on March 4, 2019, for an order dismissing the Class Action Complaint, with prejudice, for failure to state a claim upon which relief can be granted. American Security shall rely upon the accompanying Brief in Support of Motion to Dismiss. A proposed form of order is filed herewith. Pursuant to L. Civ. R. 78.1(b), oral argument is requested.

Dated: January 29, 2019

Respectfully submitted,

CARLTON FIELDS JORDEN BURT, P.A.

/s/ Robert W. DiUbaldo

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American Security Insurance Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion to Dismiss the Class Action Complaint was filed on January 29, 2019, with the Clerk by using the CM/ECF system, which system served all counsel of record.

/s/ Robert W. DiUbaldo

Robert W. DiUbaldo